

1 HONORABLE JUSTIN L. QUACKENBUSH
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5 Mr. Steven C. Lacy
6 Lacy Kane, P.S.
7 455 6th St. NE
8 East Wenatchee, WA 98802
9 (509) 884-9541

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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON
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15 BRANDI JACKSON,)
16 Plaintiff,) NO. CV-06-00364-JLQ
17 vs.)
18 ALBERTSON'S, INC.,)
19 Defendant.)
20
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22 Plaintiff Brandi Jackson, through Steven C. Lacy of Lacy Kane, P.S.,
23 pursuant to the Scheduling Conference Order dated March 7, 2007, submits this
24 list witnesses who may be called at trial.
25

26 1. Brandi Jackson
27 211 Ridgemont Drive
28 East Wenatchee, WA 98802
(509) 630-3643

29 Brandi Jackson would have information concerning her
30 employment at Albertson's and the frequent and unwanted touching and sexual
31 overtures towards her by the store director Greg Bruggman. She would also have
32 information concerning how the frequent and unwanted touching and sexual
33

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1 overtures affected her employment at Albertson's and the distress it caused in her
 2 life.

3 2. Greg Bruggman
 4 Address unknown
 5 Albertson's Employee
 6 Mr. Bruggman would have information regarding his frequent
 7 and unwanted touching of the plaintiff.

8 3. Sundi Perez
 9 Address unknown
 10 East Wenatchee, WA 98802
 11 (509) 884-1424
 12 Sundi Perez would have information that Greg Bruggman kept
 13 sending the plaintiff email messages to Banner Bank (the plaintiff's place of
 14 employment following Albertson's). Sundi also spoke to Greg Bruggman and
 15 asked him to leave the plaintiff alone.

16 4. Eric Thielen
 17 920 Westchester Drive
 18 Wenatchee, WA 98802
 19 (509) 667-7982
 20 Eric Thielen is an Albertson's employee and would have
 21 information in this case as he was upset that the plaintiff was receiving favorable
 22 treatment by the store director, Greg Bruggman.

23 5. Rhonda Yenney
 24 Address unknown
 25 Wenatchee, WA 98801
 26 (509) 662-6494
 27 Rhonda Yenney, as a subordinate of the plaintiff's while the
 28 plaintiff was still employed at Albertson's, may have information regarding the
 29 frequent and unwanted touching of the plaintiff by Greg Bruggman.

30 6. Sarah Johnson
 31 Address Unknown
 32 Sarah Johnson, as a subordinate of the plaintiff's while the

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plaintiff was still employed at Albertson's, may have information regarding the frequent and unwanted touching of the plaintiff by Greg Bruggman.

7. Susan Evans
Susan Evans Counseling, MSW
434 Orondo
Wenatchee, WA 98802
(509) 662-7632

Susan Evans provided counseling to Brandi Jackson through the summer of 2006. She would be able to provide testimony as to the diagnosis, prognosis, causation and treatment she provided for injuries Brandi sustained as a result of the frequent and unwanted touching by Greg Bruggman.

8. Gina Mulhall
Address unknown
Albertson's employee

Gina Mulhall may have information regarding the issues in this matter as she was also possibly the victim of sexual harassment by Greg Bruggman.

9. Amy McDaniel
Address unknown
Former Albertson's employee

Amy McDaniel may have information regarding the issues in this matter as she was also possibly the victim of sexual harassment by Greg Bruggman.

Plaintiff hereby reserves the right to call any fact witnesses identified

by Defendants in discovery and/or designated witness lists filed with the Court at the time of trial.

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1 DATED this 30th day of April, 2007.
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4 By s/ Steven C. Lacy
5 WSBA NO. 10814
6 Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2007, I electronically filed Plaintiff's
Witness List with the Clerk of the Court using the CM/ECF System, which will
send notification of such filing to the following:

Kenneth J. Diamond
Winterbauer & Diamond, P.L.L.C.
1200 Fifth Avenue, Suite 1910
Seattle, WA 98101

Adam G. Cuff
Winterbauer & Diamond, P.L.L.C.
1200 Fifth Avenue, Suite 1910
Seattle, WA 98101

s/ STEVEN C. LACY
STEVEN C. LACY
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